

## EXHIBIT 4

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**From:** Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>  
**Sent:** Monday, March 22, 2021 5:09 PM  
**To:** Andrew J. Maloney <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; Waleed Nassar <[Waleed.Nassar@LBKMLAW.com](mailto:Waleed.Nassar@LBKMLAW.com)>; Aisha Bembry <[Aisha.Bembry@LBKMLAW.com](mailto:Aisha.Bembry@LBKMLAW.com)>  
**Cc:** Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; Tarbutton, Scott <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Flowers, Jodi <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; Goldman, Jerry S. <[Jgoldman@andersonkill.com](mailto:Jgoldman@andersonkill.com)>; Alan Kabat <[kabat@bernabeipllc.com](mailto:kabat@bernabeipllc.com)>  
**Subject:** RE: EXTERNAL-RE: MDL 1570 - Meeting re: March 11 Order as to Dr. Naseef

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Waleed – I am assuming that you have some proposal in mind for us to consider. If so, then rather than getting on a call and hearing you out only to then tell you that we need to discuss it on our side before meeting with you again, is there a way that you can reduce your proposal to an email that we can see and then discuss on our side before we meet and confer. Given the activity level over the next two weeks, it would help to avoid redundant meetings, if possible. Thanks.

**Robert Haefele** | Attorney at Law | Motley Rice LLC  
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**From:** Andrew J. Maloney <[AMaloney@kreindler.com](mailto:AMaloney@kreindler.com)>  
**Sent:** Monday, March 22, 2021 5:03 PM  
**To:** Waleed Nassar <[Waleed.Nassar@LBKMLAW.com](mailto:Waleed.Nassar@LBKMLAW.com)>; Aisha Bembry <[Aisha.Bembry@LBKMLAW.com](mailto:Aisha.Bembry@LBKMLAW.com)>  
**Cc:** Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; Tarbutton, Scott <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Haefele, Robert <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>; Flowers, Jodi <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; Goldman, Jerry S. <[Jgoldman@andersonkill.com](mailto:Jgoldman@andersonkill.com)>; Alan Kabat <[kabat@bernabeipllc.com](mailto:kabat@bernabeipllc.com)>  
**Subject:** EXTERNAL-RE: MDL 1570 - Meeting re: March 11 Order as to Dr. Naseef

We have the deposition of Saleh al Ash Sheikh tomorrow for most of the day.

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**From:** Waleed Nassar <[Waleed.Nassar@LBKMLAW.com](mailto:Waleed.Nassar@LBKMLAW.com)>  
**Sent:** Monday, March 22, 2021 4:30 PM  
**To:** Aisha Bembry <[Aisha.Bembry@LBKMLAW.com](mailto:Aisha.Bembry@LBKMLAW.com)>  
**Cc:** Carter, Sean <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)> <[SCarter1@cozen.com](mailto:SCarter1@cozen.com)>; zScott Tarbutton <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; zRobert Haefele <[rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)>; zJodi W. Flowers <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; Andrew J. Maloney <[AMaloney@kreindler.com](mailto:AMaloney@kreindler.com)>; Goldman, Jerry S. <[Jgoldman@andersonkill.com](mailto:Jgoldman@andersonkill.com)>; Alan Kabat <[kabat@bernabeipllc.com](mailto:kabat@bernabeipllc.com)>  
**Subject:** Re: MDL 1570 - Meeting re: March 11 Order as to Dr. Naseef

Counsel,

Following up on the below.

The court ordered us to meet and confer and to file an update by Thursday of this week. Please let us know what times you are

available tomorrow after 11 am for a call. Thanks.

Waleed

Sent from my iPhone

On Mar 22, 2021, at 8:10 AM, Aisha Bemby <[Aisha.Bembry@lbkmlaw.com](mailto:Aisha.Bembry@lbkmlaw.com)> wrote:

Counsel,

Further to my email below, can you let us know if you are available for a meeting today. If today is not workable, please provide your availability tomorrow.

Thanks,  
Aisha

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**From:** Aisha Bemby  
**Sent:** Friday, March 19, 2021 1:06 PM  
**To:** Carter, Sean ([SCarter1@cozen.com](mailto:SCarter1@cozen.com)) <[scarter1@cozen.com](mailto:scarter1@cozen.com)>; Tarbutton, Scott <[starbutton@cozen.com](mailto:starbutton@cozen.com)>; Haeefe, Robert <[rhaefe@motleyrice.com](mailto:rhaefe@motleyrice.com)>; Flowers, Jodi <[jflowers@motleyrice.com](mailto:jflowers@motleyrice.com)>; Andrew J. Maloney <[amaloney@kreindler.com](mailto:amaloney@kreindler.com)>; Goldman, Jerry S. <[jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)>  
**Cc:** Waleed Nassar <[Waleed.Nassar@LBKMLAW.com](mailto:Waleed.Nassar@LBKMLAW.com)>; Alan Kabat <[kabat@bernabeipllc.com](mailto:kabat@bernabeipllc.com)>  
**Subject:** MDL 1570 - Meeting re: March 11 Order as to Dr. Naseef

Counsel,

In reference to the Court's March 11 Order (attached) directing the parties to jointly submit a proposal as to the litigation with respect to Dr. Naseef, are you available for a meeting this upcoming Monday, March 22nd? We are generally available before 2 pm. Please let us know your availability and we will circulate a Zoom meeting invite.

Regards,  
Aisha

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Aisha E. Bemby

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*This communication is confidential and may contain privileged information. If you have received this communication in error, please delete it and advise the sender by reply e-mail. Thank you.*

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continue to be responsive to clients and minimize any disruptions. You may continue to contact any of us through normal channels – telephone or email.

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